EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA Alexandria Division

DELTON GOODRUM	
Plaintiff,	
v.	Case No. 1:24-cv-01111 (PTG/WEF)
CITY OF ALEXANDRIA, a municipal. Corporation of Virginia	
Defendant.))

DECLARATION OF JAMIE BRIDGEMAN

- I, Jamie Bridgeman, declare as follows:
- 1. My name is Jamie Bridgeman.
- 2. I am over the age of eighteen (18) and have personal knowledge of the facts declared within.
- 3. I began my employment the Alexandria Police Department in 1996, and have known Lt. Delton Goodrum since January 1997.
- 4. I have served as Lt. Goodrum's supervisor on approximately two occasions during my employment at the Department.
- 5. Lt. Goodrum is an outstanding police officer and a really good commander. As a lieutenant, he is competent, effective, communicative, and always does well on processes. I think he would make a great Captain.
- 6. It is my understanding that Lt. Goodrum was next in line for promotion to Captain in December 2022. Lt. Goodrum would have been selected for promotion had Chief Hayes adhered to the common practice of selecting from the highest rated eligible candidate on the operative eligibility list.
- 7. On December 18, 2022, Chief Hayes sent me an email seeking my input on whether any reasons existed not to promote the candidates I supervised who were on the Captain eligibility list: Lt. Goodrum and Lt. Patterson. I told Chief Hayes there was not, and that he could not go wrong with either individual in the position.

Jamie Bridgeman

- 8. Later that day, Acting Assistant Chief Dennis Andreas instructed me to call Lt. Goodrum and Lt. Patterson and inform them they were not being promoted. I did not want to make these calls because I did not have any information about why they were not promoted and would not be able to answer their questions. I informed my supervisor, Acting Assistant Chief Dennis Andreas, that I believed Chief Hayes to be better suited to have these discussions, but I ultimately ended up making the phone calls myself.
- 9. Soon thereafter, I learned that, at least a day before reaching out to me for any negative input I had on the lieutenants I supervised, Chief Hayes had already made and formalized the decision to promote Jerry Newcomb to Captain.
- 10. I became upset upon this discovery because he purposefully misled the lieutenants, myself included. I then sent Chief Hayes the attached email regarding the important of truthfulness in law enforcement. *See* Exhibit B-1.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: February 25/04, 2025.	

Declaration of Jamie Bridgeman vWitness Review - Revised

Final Audit Report

2025-02-25

Created:

2025-02-25

By:

Joshua Erlich (jerlich@erlichlawoffice.com)

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Signed

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"Declaration of Jamie Bridgeman vWitness Review - Revised" Hi story

- Document created by Joshua Erlich (jerlich@erlichlawoffice.com) 2025-02-25 6:33:25 PM GMT
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 Signature Date: 2025-02-25 6:35:32 PM GMT Time Source: server
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EXHIBIT B-1



RE: Scott Patterson/Delton Goodrum

From Don Hayes </O EXCHANGELABS/OU EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E4D1114B552846BCA172E7A3F074402D-DON.HAYES@ALEXANDRIAVA.GOV>

Date Tue 12/20/2022 8:36 PM

To Jamie Bridgeman < Jamie. Bridgeman@alexandriava.gov>

Okay, thank you!

From: Jamie Bridgeman < Jamie. Bridgeman@alexandriava.gov>

Sent: Tuesday, December 20, 2022 8:34 PM
To: Don Hayes < Don. Hayes@alexandriava.gov > Subject: RE: Scott Patterson/Delton Goodrum

Truthfulness: Employees are required to be truthful and will give all pertinent information when testifying, making reports, conducting official business, and answering job-related questions asked by supervisors and commanders.

From: Don Hayes < Don.Hayes@alexandriava.gov > Sent: Sunday, December 18, 2022 12:40 PM

To: Jamie Bridgeman < <u>Jamie.Bridgeman@alexandriava.gov</u>> **Cc:** Dennis Andreas < <u>Dennis.Andreas@alexandriava.gov</u>>

Subject: Scott Patterson/Delton Goodrum

Hi Jamie:

Delton and Scott are both on the current captain's list for promotion. Both of their evaluations are fine, but since you supervise them, I wanted to know if you know of anything that should preclude them from being considered for promotion to the rank of Captain? If so, would you please submit the reason to me in writing for my file. If not, a reply of no will be sufficient.

Thanks

Chief Don Hayes Alexandria Police Department

3600 Wheeler Avenue, Alexandria, VA 22304

Office: 703.746.6704 / don.hayes@alexandriava.gov

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Building on a foundation of Excellence!